

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>HAROLD BRENT KEITH,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a "Harold Wallace," a/k/a</b>	<b>:</b>	<b>21 U.S.C. § 841(a)(1) (distribution of</b>
<b>"Brian Keith," a/k/a "New</b>	<b>:</b>	<b>cocaine base ("crack") - 1 count)</b>
<b>York"</b>	<b>:</b>	<b>21 U.S.C. § 841(a)(1) (possession with</b>
	<b>:</b>	<b>intent to distribute cocaine base ("crack")</b>
	<b>:</b>	<b>- 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 924(c)(1) (carrying a firearm</b>
	<b>:</b>	<b>during and in relation to a drug</b>
	<b>:</b>	<b>trafficking crime - 1 count)</b>
		<b>18 U.S.C. § 922(g)(1) (convicted felon in</b>
		<b>possession of a firearm - 1 count)</b>
		<b>Notice of prior conviction</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about May 10, 2003, in Falls Township, Bucks County, in the Eastern  
District of Pennsylvania, defendant

**HAROLD BRENT KEITH,**  
**a/k/a/ "Harold Wallace,"**  
**a/k/a "Brian Keith,"**  
**a/k/a "New York"**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of  
cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT TWO**

**THE GRAND JURY CHARGES THAT:**

On or about May 10, 2003, in Falls Township, Bucks County, in the Eastern District of Pennsylvania, defendant

**HAROLD BRENT KEITH,  
a/k/a/ "Harold Wallace,"  
a/k/a "Brian Keith,"  
a/k/a "New York"**

knowingly and intentionally possessed with intent to distribute more than five grams, that is, approximately 10.5 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 25, 2003, in Falls Township, Bucks County, in the Eastern District of Pennsylvania, defendant

**HAROLD BRENT KEITH,  
a/k/a/ "Harold Wallace,"  
a/k/a "Brian Keith,"  
a/k/a "New York"**

knowingly carried a firearm, that is, a Hi-Point .380 caliber semiautomatic pistol, Model CF, serial no. P737408, loaded with eight live rounds of ammunition, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine base ("crack") in violation of Title 21, United States Code, Section 841(a).

In violation of Title 18, United States Code, Sections 924(c)(1) and 924(c)(1)(A)(ii).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 25, 2003, in Falls Township, Bucks County, in the Eastern District of Pennsylvania, defendant

**HAROLD BRENT KEITH,  
a/k/a/ "Harold Wallace,"  
a/k/a "Brian Keith,"  
a/k/a "New York"**

having been convicted in a court of the State of New York of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Hi-Point .380 caliber semiautomatic pistol, Model CF, serial no. P737408, loaded with eight live rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**NOTICE OF PRIOR CONVICTION**

**THE GRAND JURY FURTHER CHARGES THAT:**

Defendant **HAROLD BRENT KEITH, a/k/a/ “Harold Wallace,” a/k/a “Brian Keith,” a/k/a “New York”** committed the offenses charged in Counts One and Two of this indictment after having been convicted in a court of the State of New York of a felony drug offense as follows:

Attempt Criminal Sale of a Controlled Substance on indictment No. 8134-94 (Kings County Superior Court, Nov. 9, 1995)).

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**NOTICE OF FORFEITURE**

As a result of the violations of Title 18, United States Code, Sections 924(c)(1) and 922(g)(1), set forth in this indictment, the defendant:

**HAROLD BRENT KEITH,  
a/k/a/ "Harold Wallace,"  
a/k/a "Brian Keith,"  
a/k/a "New York"**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of such offenses, including, but not limited to:

One Hi-Point .380 caliber semiautomatic pistol, Model CF, serial no. P737408, and eight live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN  
UNITED STATES ATTORNEY**